FILED
JAMES J. VILT JR., CLERK
U.S. DISTRICT COURT
W/D OF KENTUCKY

Date: Nov 21, 2025

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
OWENSBORO DIVISION

LEYLA REGINA NAVARRETE, Petitioner, v. Kristi Noem, Secretary of the U.S. Department of Homeland Security; Pam Bondi, Attorney General of the United States; Jason Woosley, Jailer, Grayson County Jail; Sam Olson, Director of Chicago Field Office, U.S. Immigration and Customs Enforcement; Todd Lyons, Acting Director of Immigration and Customs Enforcement; Robert Lynch, Director of Detroit Field Office, U.S. Immigration and U.S. Immigration and Customs Enforcement; and Daren K. Margolin, Director, Executive Office for Immigration Review, in their official capacities, Respondents.	Case No. 4:25-CV-157-DJH **PETITION FOR WRIT OF HABEAS CORPUS** **ORAL ARGUMENT REQUESTED**

Now comes Petitioner, Leyla Regina Navarrete, by and through counsel, and petitions this honorable Court for a writ of habeas corpus under 28 U.S.C. § 2241. The Petitioner is an asylum applicant with a valid employment authorization document and social security number who has been living in the United States for over three years. The Petitioner is currently detained by the Respondents at the Grayson County Jail in Grayson County, Kentucky. She has been in

custody since approximately August 7, 2025. She hereby challenges her continued detention on the basis that there is no significant likelihood of her release in the foreseeable future. The Petitioner therefore respectfully requests that this Court issue a writ of habeas corpus and order petitioner's release from custody. In the alternative, Petitioner requests that this Court conduct a bond hearing.

INTRODUCTION

1. Leyla Regina Navarrete crossed the southern border without inspection on September 13, 2022. She then presented to immigration officials and was lawfully paroled into the United States. She timely applied for asylum and holds a valid employment authorization document and social security number. Despite this, she was detained by the Respondents on August 7, 2025. Despite repeated requests to the Respondents, she was denied any ability to see a judge and was held without charges for nearly three months. Finally on October 29, 2025, the government file a putative Notice to Appear (NTA) charging document in her case, which was defective and/or fraudulent. Therefore she is still being held without charges as of today's date. Accordingly, to vindicate Petitioner's constitutional and regulatory rights, this Court should grant the instant petition for a writ of habeas corpus.
2. Absent an order from this Court, Petitioner will remain in detention indefinitely.
3. Petitioner asks this Court to find that she is being held without cause and order her immediate release or in the alternative, issue an Order scheduling a bond hearing.

JURISDICTION

4. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq*.

5. This Court has subject matter jurisdiction under 28 U.S.C. § 2243 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause). Under 8 U.S.C. § 1252(e)(2), this Court has habeas authority to determine whether Petitioner was ordered removed under 8 U.S.C. § 1225(b)(1).

6. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

7. Administrative exhaustion is not required before this Court may consider the Petitioner's request. 8. U.S.C. § 1252(d) requires exhaustion only as to review of a final order of removal. Petitioner is not seeking review of a final order of removal. Persuasive authority has been issued in other Federal courts. "Because the decision Giron Reyes challenges is neither final nor an order of removal, the provision is inapplicable. *Cf. Araujo-Cortes v. Shanahan*, 35 F. Supp. 3d 533, 538 (S.D.N.Y. 2014) ("There is no statutory requirement that a habeas petitioner exhaust his administrative remedies before challenging his immigration detention."); *J.O.E. v. Bondi*, ___ F. Supp. 3d ___, 2025 WL 2466670, at *5 (D. Minn. Aug. 27, 2025)." *Giron Reyes v. Lyons*, No. 5:25-cv-04048, 10-11 (N.D. Iowa Sep 23, 2025).

8. If the Court finds the *Giron Reyes* analysis unpersuasive and instead determines exhaustion is required, Petitioner still meets her burden in demonstrating that jurisdiction does exist. Her sole avenue for redress is in the instant court as she has exhausted all other potential remedies. She unsuccessfully applied for relief via custody redetermination pursuant to 8 C.F.R. § 1236 before the EOIR Cleveland Immigration Court. On November 5, 2025, Immigration Judge Richerd Drucker denied her request

based on a lack of jurisdiction. Further appeal to the Board of Immigration Review (BIA) would be futile as the BIA has issued recent decisions upholding the legally indefensible position that parolees and noncitizens who enter without inspection are ineligible for bond. *See Matter of Q. LI, 29 I&N Dec. 66 (BIA 2025); Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025).*

VENUE

9. Venue is proper because Petitioner is detained at Grayson County Jail in Leitchfield, KY which is within the jurisdiction of this District.

10. Venue is proper in this District because Respondents are officers, employees, or agencies of the United States and Respondent Navarrete is detained in this District; a substantial part of the events or omissions giving rise to her claims occurred in this District given her current detainment in Grayson County Jail. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. §2243

11. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

12. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

13. Petitioner is "in custody" for the purposes of § 2241 because she is arrested and detained by Respondents.

PARTIES

14. Petitioner is an asylum applicant currently detained at Grayson County Jail. She is in the custody, and under the direct control, of Respondents and their agents.

15. Respondent Jason Woosley is sued in his official capacity as the Jailer of the facility where Petitioner is held. In this capacity, he is a legal custodian of the Petitioner. Respondent's address is 320 Shaw Station Road, Leitchfield, Kentucky 42754.

16. Respondent Daren K. Margolin is sued in his official capacity as the Director of Executive Office of Immigration Review (EOIR). In this capacity, Respondent Margolin is responsible for the policy and operations of EOIR, the Immigration Court system. EOIR has the authority to order the Petitioner be released.

17. Respondent Todd Lyons is sued in his official capacity as the acting director of U.S. Immigration and Customs Enforcement (ICE). Petitioner Lyons is a legal custodian of the Respondent and he has authority to release her.

18. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Kristi Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner's detention. Respondent Noem is a legal custodian of Petitioner.

19. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that

capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent Bondi is a legal custodian of Petitioner.

STATEMENT OF FACTS

20. Petitioner is a 28-year-old citizen of Nicaragua. She was [redacted] She and her husband have been living and working lawfully in Indiana for the past three years and have become active members of their church. She is currently pregnant with their first child due in December.

21. Petitioner entered the United States of America on September 13, 2022 by crossing the southern border without inspection to seek asylum.

22. Immediately thereafter, she presented to immigration authorities and was inspected by U.S. Customs and Border Patrol (CBP) at the Laredo, Texas port of entry and paroled into the United States under INA §212(d)(5). She timely filed her I-589 asylum application with USCIS and was awaiting her interview. She has a valid work permit and social security number.

23. On August 1, 2025, the U.S. District Court for the District of Columbia in *CHIRLA v. Noem* stayed government policies seeking to put individuals who entered on parole at a port of entry in expedited removal proceedings. *CHIRLA v. Noem*, 1:25-cv-00872, (D.D.C.).

24. On August 7, 2025, Petitioner attended an ICE appointment as scheduled in Indianapolis and was detained. ICE immediately issued an Expedited Removal (ER) order against her despite the CHIRLA decision, nearly three years in the country and her pending asylum

application. She requested a credible fear interview due to her political opinion in Nicaragua.

25. On August 19, 2025, counsel contacted her deportation officer at the Indianapolis ICE office advising them of representation and requesting to cease ER proceedings and release her. ICE responded on the same day, refusing counsel's request.

26. On August 25, 2025, the CFI was held; Petitioner was forced to attend pro se as ICE made no attempt to contact her counsel of record.

27. On August 29, 2025, Petitioner was served with the decision denying her CFI, despite disclosing that she had participated in the political protests in Nicaragua and was threatened for her political opinion. On the same date, she requested immigration judge review which must take place within 7 days by statute. 8 CFR § 1003.42.

28. Also on August 29, 2025, the U.S. District Court for the District of Columbia in *Make the Road NY v. Noem* stayed expedited removal for non-citizens who entered unlawfully and have spent more than 2 years in the interior of the USA. *Make the Road NY v. Noem,* 1:25-cv-00190-JMC, (D.D.C.).

29. On September 1, 2025, counsel for Petitioner contacted the Indianapolis ICE office again, referencing the *Make the Road NY* decision and again demanding to cease ER proceedings and release Petitioner. Counsel received no response from Respondent.

30. By September 19, 2025, Petitioner was still detained and no IJ review had been scheduled as of 21 days after service of CFI decision. Again, undersigned Counsel contacted Indianapolis ICE as well as Indianapolis OPLA (Counsel for ICE), and the asylum office seeking information. Asylum referred undersigned to ICE; yet again, Counsel for Petitioner received no response from ICE/OPLA.

31. By October 15, 2025, the IJ review had still not taken place, and no Notice to Appear (NTA) had been filed. Counsel for Petitioner filed for a bond hearing in the Cleveland immigration court, which currently has jurisdiction over the immigration cases of those detained at Greyson County Jail. Also on October 15, undersigned contacted Cleveland OPLA seeking government position. Again, Counsel received no response.

32. An October 16, 2025 review of ECAS (the immigration court efiling system) showed that an NTA was allegedly filed on October 15, 2025 and the immigration judge terminated proceedings on October 16, 2025 for failure to prosecute. A later review of the system showed information inconsistent with what appeared in ECAS on October 16: that an NTA filed October 15th remained pending with no hearing date set; however, the case did not permit counsel to enter an appearance. Bond proceedings and removal proceedings in the Immigration Court are separate, and thus Counsel must enter an appearance in each matter separately if they intend to represent the noncitizen in both matters.

33. On October 24, 2025, Counsel for Petitioner contacted the Cleveland Immigration Court to request an in-person file review of the mysterious NTA. On October 27, 2025, Court staff responded and denied a file existed and stated there had been no NTA filed. On the same day, the Court issued a notice scheduling a bond hearing to take place on November 4. Historically, such hearing notices are issued usually on the same day or within 1-2 days of the bond request.

34. On November 4, 2025, Immigration Judge Drucker at the Cleveland Immigration Court held a bond hearing and found that he lacked jurisdiction to decide the Petitioner's bond

request. On the record, he made alternative findings that if he had jurisdiction, he would have issued a bond in the lowest statutory amount due to the Respondent's equities.

35. Also on November 4, 2025, immediately following the bond hearing, Immigration Judge Drucker held a master calendar hearing in removal proceedings, despite the fact that ECAS continued to indicate no hearing had been set. The Judge indicated that the government had filed an NTA with the Court on October 29, 2025.

36. On November 6, 2025, undersigned Counsel was able to enter an appearance for the removal proceedings on ECAS and obtained a copy of a putative NTA which appeared defective and/or fraudulent. It purports to have been served on the Petitioner on October 15, 2025, but contains a signature from the issuing officer dated October 29, 2025, an impossibility.

37. On the same day, Counsel also obtained a copy of form I-261 Additional Charges of Inadmissibility/Deportability, filed with the Immigration Court on October 30, 2025. It purported to have been served on Counsel via ECAS on October 30, 2025, although Counsel had not entered an appearance in removal proceedings until November 6 nor been granted access to any records in the removal proceedings.

LEGAL FRAMEWORK

38. The Refugee Act broadly affords a right to apply for asylum to any noncitizen "who is physically present in the United States or who arrives in the United States[.]" 8 U.S.C. §1158(a)(1).

39. Noncitizens seeking asylum are guaranteed Due Process under the Fifth Amendment to the U.S. Constitution. Reno v. Flores, 507 U.S. 292, 306 (1993).

40. Noncitizens who are applicants for asylum are entitled to a full hearing in immigration court before they can be removed from the United States. 8 U.S.C. § 1229a. Consistent with due process, noncitizens may seek administrative appellate review before the Board of Immigration Appeals of removal orders entered against them and judicial review in federal court upon a petition for review. 8 U.S.C. § 1252(a) et seq.

41. In 1996, Congress created "expedited removal" as a truncated method for rapidly removing certain noncitizens from the United States with very few procedural protections. 8 U.S.C. § 1225(b)(1). Because there are few procedural protections, including limited rights to counsel and to appeal or challenge the government's decision, expedited removal applies narrowly to only a specific subgroup of noncitizens. They must be inadmissible to the United States under specific provisions of the INA, and further they must be either (1) noncitizens "arriving in the United States," or (2) noncitizens who "ha[ve] not been admitted or paroled into the United States" and cannot affirmatively show that they have been "physically present in the United States continuously for the 2-year period immediately prior to the date of the determination of inadmissibility." 8 U.S.C. § 1225(b)(1)(A)(i)–(iii); § 1182(a)(6)(C), (a)(7) No other person may be subjected to expedited removal. 8 C.F.R. §235.3(b)(1), (b)(3).

42. Noncitizens subjected to expedited removal are ordered removed by an immigration officer "without further hearing or review." 8 U.S.C. § 1225(b)(1)(A)(i).

43. Despite being advised by Petitioner and Counsel multiple times that the Petitioner had been physically present for over two years – according to the Respondents' own records – Respondents refused to cease the Petitioner's expedited removal process, and have not rescinded the expedited removal order issued against her.

44. According to the putative charging documents filed with the Immigration Court on October 29 and October 30, Petitioner is charged with, inter alia, having entered the United States without inspection. 8 U.S.C. § 1182(a)(6)(A)(i).

45. On July 8, 2025, DHS, in collaboration with the Executive Office for Immigration Review (Immigration Courts) issued a new policy instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without inspection—to be an "applicant for admission" under 8 U.S.C. § 1225(b)(2)(A) and therefore subject to mandatory detention.

46. On September 5, 2025, the Board of Immigration Appeals turned this new policy into precedent by issuing a decision that said it did "not have the authority" to hear any bond request for a noncitizen who had entered the United States without inspection, regardless of the time they had been in the country. *Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025).*

47. The Respondents have alleged that notwithstanding Petitioner's over three years of residing in the United States, she is nevertheless an "applicant for admission" who is "seeking admission" and subject to mandatory detention under § 1225(b)(2)(A).

48. Based on this allegation, Respondents have asserted that they do not have jurisdiction over Petitioner's bond hearing and that she is subject to mandatory detention.

49. Petitioner's detention violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered and are now residing in the United States. Instead, such individuals are subject to a different statute, § 1226(a), that allows for release on conditional parole or bond. That

statute expressly applies to people who, like Petitioner, are charged as inadmissible for having entered the United States without inspection.

50. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner. Respondents' interpretation of statute would render most of § 1226(a) moot.

51. Court after court has rejected ICE and EOIR's new interpretation of the INA's detention authority and found that § 1226(a), not § 1225(b), applies. *See, e.g.*, *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025); *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588, at *1 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670, at *8 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3,

2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *see also, e.g.*, *Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566 at *2 (D. Neb. Sept. 3, 2025) (noting that "[t]he Court tends to agree" that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025) (same).

52. Accordingly, Petitioner seeks a writ of habeas corpus requiring her immediate release from custody or, in the alternative that she be provided a bond hearing under § 1226(a) within seven days in which DHS bears the burden of establishing the necessity of petitioner's continued detention and considers alternatives to detention that could mitigate flight risk.

53. Immigration detention should not be used as a punishment and should only be used when, under an individualized determination, a noncitizen is a flight risk because they are unlikely to appear for immigration court or a danger to the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

54. There are only narrow, nonpunitive circumstances under which a special justification authorizes [indefinite civil confinement]. *Giron Reyes v. Lyons*, No. 5:25-cv-04048, 10-11 (N.D. Iowa Sep 23, 2025), citing *Zadvydas*, 533 U.S. at 690. Which the removable status of an alien, standing alone, does not qualify. Id. at 691–92. By seeking detention under § 1225(b), the Government deprives a suspected alien the chance for a bond determination, thus taking away an individualized finding of dangerousness or flight risk

to keep the alien detained throughout the removal proceedings. Cf. Jennings, 583 U.S. at 330–31 (Breyer, J., dissenting).

55. Where an alien's circumstances would seem to make her a worthy candidate for release on bond (at least if she were seeking bond in the criminal context), a protracted civil detention clearly threatens irreparable harm. *Giron Reyes v. Lyons*, No. 5:25-cv-04048, 10-11 (N.D. Iowa Sep 23, 2025).

CLAIMS FOR RELIEF

COUNT ONE
Violation of Fifth Amendment Right to Due Process

56. The allegations in the above paragraphs are realleged and incorporated herein.

57. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of "life, liberty, or property, without due process of law." U.S. Const. Amend. V. Due process protects "all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693.

58. Due process requires that government action be rational and non-arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

59. The Constitution guarantees that "no person shall be removed from the United States without opportunity, at some time, to be heard." Including noncitizens who are "entitle[d] . . . to due process of law in the context of removal proceedings." A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025).

60. For these reasons, Petitioner's detention violates the Due Process Clause of the Fifth Amendment.

COUNT TWO
Violation of 8 U.S.C. §§ 1225 and 1226 and Implementing Regulations

61. The allegations in the above paragraphs are realleged and incorporated herein.

62. " Section 1225 covers "applicants for admission"; defined as "[a]n alien present in the United States who has not been admitted or who arrives in the United States." 8 U.S.C. § 1225(a)(1). These applicants must undergo an inspection by an immigration officer to ensure their admissibility into the United States. 8 U.S.C. § 1225(a)(3); Jennings v. Rodriguez , 583 U.S. 281, 287 (2018). If they are found to be unlawful entrants, they are split into two categories.", *Giron Reyes v. Lyons*, No. 5:25-cv-04048, 2 (N.D. Iowa Sep 23, 2025).

63. Petitioner, both because she was inspected and paroled, and because she has been present in the country for over three years, is not an "applicant for admission" and as such, contends that the Government must abide by the procedures under 1226.

64. Petitioner has been in detainment for over 90 days with no bond hearing date or release date, and no valid charging document initiating removal proceedings.

65. For these reasons, Petitioner's detention violates 8 U.S.C. §§ 1225 and 1226 and 8 C.F.R. § 1003.42.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

1. Assume jurisdiction over this matter;
2. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
3. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment, 8 U.S.C. §§ 1225 and 1226, and/or 8 C.F.R. § 1003.42;

4. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately, or in the alternative, schedule a bond hearing before an immigration judge;
5. Determine whether Petitioner was lawfully ordered removed under 8 U.S.C. § 1225(b)(1).
6. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
7. Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ gwenn starda

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Dated: November 20, 2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Leyla Regina Navarrete, and submit this verification on her behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 20th day of November, 2025.

/s/ gwenn starda
Gwendolyn Starda